

Institute for Policy & Social Research
Center for Environmental Policy
607 Blake Hall
1541 Lilac Lane
University of Kansas
Lawrence, KS 66044-3129
785-864-4507

June 29, 2015

Dear EPA Freedom of Information Act Office,

With this letter, we wish to request the following information from the Environmental Protection Agency under the Freedom of Information Act. We had previously asked for similar information and received spreadsheets on September 3, 2013 from Emery Harriston. Specifically, we would like to have the following information for all 50 states for all facilities within the Clean Water Act.

For this research purpose, we request information stored in the EPA Permit Compliance System (PCS) database, the Integrated Compliance Information System (ICIS) database, and the Facility Registry Service (FRS). From these databases, we request data for the time period between January, 1990 to present for all National Pollutant Discharge Elimination System (NPDES) facilities located in the entire United States. We request data for all facilities meeting these criteria that have ever existed in the NPDES system during the above noted timeframe. If this condition cannot be met, we request that you identify the scope of the data that can be provided, e.g., data for only those facilities presently existing in the NPDES system. We suspect that this condition differs across the types of data that we are requesting. Therefore, we request that the identification of scope be offered for each type of data separately.

We request data for individual permits only. We do not wish to receive data for general permits or master general permits.

We request that the following data for facilities meeting the identified conditions be extracted from the PCS, the ICIS, and the FRS databases. Where historical data exist in the PCS database for those states that have migrated to the ICIS database, we request data from both systems in order to meet our temporal requirements. If overlap exists between these two data sources, we wish to receive only one record, i.e., we wish to receive data from either the ICIS database or the PCS database but not from both databases. As important, we request that the extracts from both the PCS and the ICIS be merged into a set of composite data extracts --- one composite data extract for each for the following data groups --- while identifying the data source --- PCS or ICIS --- for each relevant record.

Data Group 1: Contact Information from ICIS/PCS

For each facility, we request current and historical information on the facility's contact details. Specifically, we request these data elements:

1. Facility identification number (NPDES ID)
2. Facility name
3. Contact information for cognizant official
 - 3.1. Name
 - 3.2. Title and/or position
 - 3.3. Phone number (s)
 - 3.4. Mailing address (s)
 - 3.5. Email address
 - 3.6. Fax number

Data Group 2: Contact Information and Industrial Classification from FRS

For each facility, we request current and historical information on the facility's contact and industrial classification details. Specifically, we request these data elements:

1. Facility identification number (NPDES ID)
2. Facility name
3. Standard Industrial Classification (SIC) code – 4 digit code
4. Contact information for cognizant official
 - 4.1. Name
 - 4.2. Title and/or position
 - 4.3. Phone number(s)
 - 4.4. Mailing address
 - 4.5. Email address
 - 4.6. Fax number

In closing, I wish to state that our research project operates within the Center for Environmental Policy of the University of Kansas and that we are requesting information for a scholarly purpose. As such, we request a waiver of all fees.

Thank you greatly for your assistance and consideration of our request. If you have any questions or concerns about our FOIA request, please contact me by phone at 785-864-4507, by email at Earnhart@ku.edu, or by postal mail using the address shown above. I look forward to hearing from you as your schedule permits.

Gratefully yours,

Dietrich Earnhart
Director
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